

Plaintiff(s)

V.

BARACK OBAMA, et al.

Defendant(s)

[illegible]

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

Plaintiff, Hong Wang hereby submits its opposition to defendants' Motion to Dismiss the Complaint.

INTRODUCTION

Plaintiff has submitted supported documents to address plaintiff's request

1. Accessory to murder investigation on Hillary Clinton and State Department

In this document, plaintiff provided several references, including the recent resolution H.Res.343 unanimously passed on June 13 2016 by 114th congress, condemning the systematic, state-sanctioned organ harvesting from non-consenting prisoners of conscience in China, including from large numbers of Falun Gong practitioners and members of other religious and ethnic minority groups. "China has been perpetuating perhaps some of the most gruesome and egregious human rights violations against Falun Gong and other prisoners of conscience, yet has hardly faced any criticism, let alone sanctions, for these abuses," explained Congresswoman Ileana Ros-Lehtinen (R-FL), who initiated this resolution last year. She stated that the persecution and organ harvesting "must be opposed universally and ended unconditionally."

(A Formidable Organ Supply Chain in China Based on Killing – New Report Released at National Press Club, June 24, 2016 | By Minghui correspondents He Yu and Mu Wenqing, <http://en.minghui.org/html/articles/2016/6/24/157546p.html>)

David Kilgour, former Canadian Secretary of State for Asia-Pacific, and human rights lawyer David Matas, published *Bloody Harvest: Organ Harvesting of Falun Gong Practitioners in China* in 2009 to expose the harvesting of organs from living Falun Gong practitioners in China, millions of whom have been detained or imprisoned for their belief.

Mounting evidence tells a terrible tale of murder and mutilation in China. Reports from witnesses and Chinese physicians reveal that thousands of Falun Gong practitioners have been killed for their organs, which are sold and transplanted at enormous profit in the transplant trade.

The perpetrators are officials of the Chinese Communist Party (CCP), acting in collaboration with surgeons, prison authorities, and military officials.

Victims are held in concentration camps prior to having their organs harvested, after which the bodies are immediately cremated.

The story, almost too dreadful to believe, was first revealed in March 2006, when a woman claimed that as many as 4,000 Falun Gong had been killed for their organs at the hospital in which she had worked. Known as Annie, she also said that her husband, a surgeon at the same hospital outside the northeastern city of Shenyang, had disclosed to her that he had removed corneas from the living bodies of 2,000 Falun Gong practitioners.

One week later, a Chinese military doctor not only corroborated the woman's account but claimed that such atrocities were taking place in 36 different concentration camps throughout the country. The largest, he said, held 120,000 persons. He said he had also witnessed Falun Gong practitioners being massively transported across the country in cattle trains, at night and under the cover of tight security.

Annie testified: "My ex-husband told me that most of the Falun Gong practitioners were strong and healthy and many were still breathing when their organs were removed. After the removal, many of them were thrown into the (hospital's) crematory oven, so that no trace was left. For others, after their organs were removed, the openings on their bodies were stitched. Some families knew practitioners were detained here, so they would be asked to sign their agreement to have the bodies cremated in crematories outside." (Two Sources Testify Publicly about the CCP's Atrocities of Harvesting Organs from Living Falun Gong Practitioners (Photos), <http://en.minghui.org/html/articles/2006/4/22/72310.html>)

On March 31 (2006) , a retired military doctor from the Shenyang Military Region stepped forward to point out that the Sujiatun Concentration Camp indeed exists and it was only one of 36 similar concentration camps. He stated that it only took one day for the military to relocate 5,000 people within a closed freight train on a special route. (Two Sources Testify Publicly about the CCP's Atrocities of Harvesting Organs from Living Falun Gong Practitioners (Photos), <http://en.minghui.org/html/articles/2006/4/22/72310.html>)

Falun Gong supporters and human rights activists overseas immediately began investigating the allegations. They placed calls to Chinese hospitals pretending to be shopping for a kidney or a liver. To their horror, one doctor after another openly confirmed: We've got Falun Gong in stock; just come in and we can get you the organ within a week.

Shocked by these reports, two prominent Canadian human rights lawyers launched their own investigation. In July 2006, former Secretary of State for Asia Pacific David Kilgour and Human Rights lawyer David Matas published their 140-page report, which drew "the regrettable conclusion that the allegations are true." Their research also concluded that the large number of organs transplanted in China since the persecution of Falun Gong began in 1999 could not possibly have been provided by voluntary donors or executed prisoners. See *Bloody Harvest*.

Ethan Gutmann, an award-winning China analyst and investigative journalist, published *The Slaughter: Mass Killings, Organ Harvesting, and China's Secret Solution to Its Dissident Problem* in 2014, after conducting an independent investigation.

Plaintiff also indicated in the document that on June 2011, State Department added a question about organ harvesting to nonimmigrant visa application form (with picture) DS-160.

Nevertheless, U.S. State Department's 2011 Human Rights Report, published on May 24, 2012, addressed the issue of illicit organ harvesting in China, mentioning Falun Gong practitioners and Uighurs. The report says: "In response to allegations that the organs of executed prisoners were harvested for transplant purposes, Vice Minister of Health Huang Jiefu in 2009 stated that inmates are not a proper source for human organs and prisoners must give written consent for

their organs to be removed. Overseas and domestic media and advocacy groups continued to report instances of organ harvesting, particularly from Falun Gong practitioners and Uighurs.” (<https://www.state.gov/j/drl/rls/hrrpt/2011/eap/186268.htm>)

Plaintiff submitted a report stating the belief that materials handed by Wang Lijun, the formal police chief and deputy mayor of Chongqing, China, to state department during his visit to US Consulate in Chengdu on Feb, 2012, contains information of genocide / illegal organ harvesting in China. “A well-placed source has now told *The Epoch Times* that Wang gave U.S. officials confidential documents containing critical information about top communist officials’ involvement in the persecution of Falun Gong. The source said Wang provided details about organ harvesting from living Falun Gong practitioners in China’s network of military hospitals, prisons, mental hospitals, and labor camps.” (Source: Wang Lijun Told U.S. Officials of Organ Harvest, By Lin Feng, *Epoch Times* <http://www.theepochtimes.com/n3/1484282-source-wang-lijun-told-u-s-officials-of-organ-harvest/>)

On October 3, 2012, 106 U.S. Congressmen signed a “Dear Colleague Letter” to Secretary of State Hillary Clinton, expressing their concerns about the forced organ harvesting in China, and requesting the State Department release any information they might have on this very important matter. The Dear Colleague letter was co-sponsored by Representative Robert Andrews (D-NJ) and Representative Chris Smith (R-NJ) and circulated in the House. In this letter, it cited Dr. Wang Guoqi, a Chinese physician, in 2001 who testified to the US House of Representatives’ International Relations Subcommittee on International Operations and Human Rights about his involvement in harvesting of organs from executed prisoners in China.

It also made a request to Clinton to release information related to transplant abuses in China handed by Wang Lijun “In February, Wang Lijun, the Deputy Mayor of Chongqing overseeing public security, spent over 24-hours at the US Consulate in Chengdu. It is claimed by some that Wang Lijun may have been personally involved in these horrific organ harvesting practices on living prisoners in China. While at the US Consulate, it is claimed that Wang Lijun may have divulged information about the harvesting of organs from still living Falun Gong practitioners. If such evidence was received and brought to light, measures could be taken to help stop such abominable abuses.”

“We therefore ask that the State Department release any information it may have that relates to transplant abuses in China, including any documentation that Wang Lijun may have provided to our Consulate in Chengdu. ” (Letter Signed by 106 U.S. Congressmen Requesting the State Department Release Information on Organ Harvesting in China <http://en.minghui.org/html/articles/2012/10/7/135751p.html>)

Wang Lijun, also the ex-director of the “On-site Mental Research Center” of the Jinzhou City Police Department, was awarded the Guanghua Innovation Award by the “China Guanghua Fund for Scientific Research.” The award was presented to him due to his research into a liquid drug which is injected to induce death. It was designed to allow the injected person to die a painless

death as quickly as possible, so organs can be harvested in the freshest state. Wang has admitted that in two years he harvested thousands of organs.

In 2009, the World Organization to Investigate the Persecution of Falun Gong released the testimony of an eyewitness who testified to the harvesting of organs from living Falun Gong practitioners. At the time he was serving as a police officer under Wang Lijun. On April 9, 2002, in an operating room on the fifteenth floor of the Shenyang Military General Hospital, he personally saw two medical personnel standing over a female high school teacher, a 30 year old Falun Gong practitioner. They did not inject her with any anesthetics, but removed her organs while she was still alive.

He recalled, "The knife was cutting downward, blood was splashing out of her... At that time, we (armed police officers) were standing on guard with a gun in each in our hands. She had already been opened up, when 'Ah!' she shouted loudly once. Then she shouted, saying 'Falun Dafa is great'... At that moment, that doctor, the military surgeon, hesitated. Then he looked at me, then at our (police officers') superior. Then our superior nodded, and he continued to do the veins... (Her) heart was carved out first, and next were the kidneys. When her cardiac veins were cut by the scissors, she started twitching. It was extremely horrible. I can imitate her voice for you, although I couldn't imitate it well. It sounded like something was being ripped apart, and then she continued "ah." Since then she always had her mouth wide open, with both her eyes opened wide. Ah... I don't want to continue." (World Organization to Investigate the Persecution of Falun Gong Publishes Case Report of Conversation with Witness to Organ Harvesting <http://en.minghui.org/html/articles/2009/12/14/113122.html>)

There should be quite a lot of witnesses who saw the materials that were handed by Wang Lijun, including former US Ambassador Gary Locke, State department employees, etc.

Ambassador Locke on Nov. 7, 2016 accepted a telephone interview from Simone Gao, a news anchor with New Tang Dynasty Television, an independent, overseas Chinese-language broadcaster and a media partner of the *Epoch Times*. Question whether material handed by Wang Lijun related to organ harvesting was raised to him:

Simone Gao: Thank you for that clarification. Were any of the documents he (Wang Lijun) brought related to forced organ harvesting?

Ambassador Locke: I am not at lib... I cannot say .. I am not going to confirm whether or not there were such documents. ('Human Rights is Part of the DNA of America': An Interview with Gary Locke on Hillary Clinton, China, and the 2016 Election By Matthew Robertson, Epoch Times <http://www.theepochtimes.com/n3/2184072-human-rights-is-part-of-the-dna-of-america-an-interview-with-gary-locke-on-hillary-clinton-china-and-the-2016-election/>)

Why can Ambassador Locke not say "No" nothing exists?

An accessory is a person who assists in the commission of a crime, but who does not actually participate in the commission of the crime as a joint principal. A 94-year-old former SS sergeant who served as a guard at Auschwitz has been found guilty of more than 170,000 counts of being an accessory to murder for helping kill 1.1 million Jews and others at the Nazi death camp. "He

said he was ashamed that he was aware Jews were being killed but did nothing to try to stop it.” (Court convicts Auschwitz guard, 94, as accessory to murder, by Associated Press, <http://www.latimes.com/world/la-fg-auschwitz-trial-20160617-snap-story.html>)

How many people in China died from 2012 to 2017 due to genocide, and organ harvesting in China? “Chinese Regime, Organ Harvesting in China Report Reveals Vast State-Run Industry to Harvest Organs in China Up to 1.5 million organ transplants may have taken place in China since 2000, mostly harvested from Falun Gong prisoners of conscience, report says” (By Matthew Robertson, *Epoch Times*, <http://www.theepochtimes.com/n3/2097522-1-5-million-potentially-killed-by-chinese-regime-for-their-organs-report-reveals/>)

“We have the choice to ignore what happens to others or to act on behalf of others,” President Obama said after a tour of the museum and a memorial service. “Our sons and daughters are not born to hate, they are taught to hate,” he said. “The state of Israel does not exist because of the Holocaust but in the survival of a strong Jewish state of Israel, the Holocaust will never happen again.” (By Susan Crabtree - The Washington Times - Friday, March 22, 2013, <http://www.washingtontimes.com/news/2013/mar/22/obama-vows-never-again-israeli-holocaust-memorial/>)

We all know Clinton used her own email server when she was a secretary of state, and FBI was investigating this case. Therefore plaintiff request FBI to release her email with China in 2012 as well.

2. National Security issue with Trump daughter Ivanka best friend Wendi Deng

Plaintiff submitted document to defendants: Fwd: National Security of Trump and his daughter best friend Wendi Deng top spy : Fwd More information about QiaoWai, US Immigration Fund also report Wendi Deng to Homeland Security, and email to Trump on 6/20/2016 5:55am : Please help investigate : Your daughter Ivanka Trump's best friend, Wendi Deng, ex-wife of Rupert Murdoch , is a Chinese Top level spy (The general political department)

In those documents, plaintiff indicated that it was widely reported in Chinese web that Wendi Deng, ex-wife of Rupert Murdoch, is a Chinese Top level spy. You could simply google 邓文迪, 间谍。 Here is one example 邓文迪被曝是解放军总政头牌间谍 (大纪元记者黄清、程新综合报导 <http://www.epochtimes.com/gb/13/6/19/n3897070.htm>). I am sure federal agency like FBI, CIA, homeland security, etc. , should have people could read Chinese.

I translated part of the report “She is a top Chinese spy with good relationship of Zeng Qinghong. She violated USA INS law on green card since she only stayed with her 1st husband for 5 months, even though she divorced at 2 years and 7 month later. She stayed at the same time with David Warlf, who paid her Yale tuition. Where did the money come from since David Warlf is not wealthy at all and only works for a Chinese Company”

Plaintiff witness asserts that Donald Trump used a very similar method as Chairman Mao got the power in China in 1949. It is called “using the rural areas to encircle the cities” by promoting cheating, hate during conflicts, etc. Chairman Mao used conflicts of countryman vs cities,

promised them a good life, promoted them to rob profit from wealthy people using violence, etc. The reality is after China Mao got the power, the countrymen are still poor in China. Here is *Nine Commentaries on the Communist Party* titles (by *Epoch Times*, <http://www.ninecommentaries.com/english/>)

COMMENTARY 1: ON WHAT THE COMMUNIST PARTY IS,

COMMENTARY 2: ON THE BEGINNINGS OF CHINESE COMMUNIST PARTY

COMMENTARY 3: ON THE TYRANNY OF THE CHINESE COMMUNIST PARTY

COMMENTARY 4: ON HOW THE CHINESE COMMUNIST PARTY IS AN ANTI-UNIVERSE FORCE

COMMENTARY 5: ON THE COLLUSION OF JIANG ZEMIN AND THE CCP TO PERSECUTE FALUN GONG PRACTITIONERS

COMMENTARY 6: ON HOW THE CHINESE COMMUNIST PARTY DESTROYED TRADITIONAL CULTURE

COMMENTARY 7: ON THE CHINESE COMMUNIST PARTY'S HISTORY OF KILLING

COMMENTARY 8: ON HOW THE CHINESE COMMUNIST PARTY IS AN EVIL CULT

COMMENTARY 9: ON THE UNSCRUPULOUS NATURE OF THE CHINESE COMMUNIST PARTY

One important thing happened on 6/20 morning right after my email to Trump, his campaign manager Corey Lewandowski got fired 8:30 am, media reported that Ivanka Trump played role in campaign manager's firing. (Ivanka gave Trump an ultimatum to fire Corey Lewandowski, By Daniel Halper and Carl Campanile June 20, 2016 <http://nypost.com/2016/06/20/ivanka-forced-trump-campaign-to-fire-corey-lewandowski/>). He was with Trump at a funding event the night before, it is reasonable for me to connect my information with his firing since it is national security related. Of course, it needs a federal agency to investigate including witnesses of Corey Lewandowski and other Trump employees.

3. Donald Trump NJ tower Rich Chinese EB5 urgent approved due to Hurricane Sandy with support of Obama

I submitted detail on Trump NJ tower Chinese Ads with pictures.

Trump Bay Street is a 50-story luxury rental apartment building being built by Kushner Companies. It hired US Immigration Fund (Chinese name 美国移民基金) together with QiaoWai (侨外) to seek rich Chinese investors.

This is the Chinese Ads website <http://www.qiaowai.net/zhuanti/xzx/> for Trump Bay Street tower Kushner and KABR Company. It clearly stated that US Immigration Fund has strong backing from the government, gained support from Obama, Debbie Wasserman -Schultz and Ron Klein in person. It also stated in the ads that it is the only one that fit for urgent approval by INS due to Hurricane Sandy. (I used a marking pen to mark the Chinese part as yellow)

Based on QiaoWai website, it has a lot of EB5 investments in US, such as w57 Manhattan, time square broadway1568, etc. Supporters to QiaoWai not only from Obama, Rudy Giuliani, Debbie Wasserman -Schultz but also from New York Governor David Peterson, Pete Grannis , Formal New York Mayor Bloomberg, etc.

QiaoWai website also stated that Brett Ashcroft-Green, who is in charge of the US Immigration Fund's Chinese section, used to be a staff member of Senator Harry Reid.

During the interview with QiaoWai CEO Dingyingvivan, she claimed that QiaoWai EB5 could be approved in 3 days.

Both Trump and Kushner did not mention Trump New Jersey Bay Street tower Chinese Ads or its Chinese Partner QiaoWai and its EB5 urgent approved due to Hurricane Sandy, when they spoke in the past of Trump New Jersey Bay Street tower to Bloomberg, based on Bloomberg and CNN report. (Trump tower's Chinese investors buy a path to U.S. citizenship, by Chris Isidore @CNMoney, March 8, 2016 <http://money.cnn.com/2016/03/08/news/companies/donald-trump-wealthy-chinese-visas/>) .

“Asked for a comment for this article, a Trump spokeswoman said by email, "This was a highly successful license deal but he is not a partner in the financing of the development." She did not respond to questions about EB-5. A Kushner spokeswoman said the project was entirely legal and creating jobs. ” (Trump Tower Funded by Rich Chinese Who Invest Cash for Visas, by Jesse Drucker March 6, 2016, <https://www.bloomberg.com/politics/articles/2016-03-07/trump-tower-financed-by-rich-chinese-who-invest-cash-for-visas>)

It cannot legal when its EB5 were urgent approved due to Hurricane Sandy since it really has nothing to with it.

4. Hate Crime of Donald Trump against Muslim

I am not the only one to observe this, I included one report in the document that I submitted to defendants: Donald Trump and the Spike in Anti-Muslim Hate Crimes in the U.S. (By Isaac Chotiner, http://www.slate.com/blogs/the_slatest/2016/05/09/donald_trump_and_the_rise_of_anti_muslim_hate_crimes.html)

Here is another example: “Hate crimes surged in the 10 days after Donald Trump’s’ election victory, according to the Southern Poverty Law Center, which said in a report that Muslim-Americans are facing the worst Islamophobia since the 9/11 terror attacks. “Behind every number is a person. Behind every statistic is someone whose rights have been violated,” Lynch

said. “When one of us falls, we all have to step up without regard for our own safety. When one of us is threatened, we all have to speak out.”(Loretta Lynch: Spike In Anti-Muslim Hate Crimes Is A ‘Stain on Our Nation’s Very Soul’ “When one of us is threatened, we all have to speak out.” By Hayley Miller http://www.huffingtonpost.com/entry/loretta-lynch-hate-crimes_us_584ecbcce4b04c8e2bb0ac1a)

ARGUMENT

Defendants move to dismiss plaintiff's Complaint under Federal Rule of Civil Procedure 12(b)(1),12(b)(2), 12(b)(5),and 12(b)(6)

a) Lack of Subject Matter Jurisdiction on the grounds that the complaint is frivolous and devoid of merit b) lacks Article III standing to sue the federal defendants because that the defendants failed to investigate his personal grievances do not establish a case or controversy c) Lack of personal jurisdiction because not shown “minimal contacts” d) Failed Perfect service to many of the federal defendants f) Senator and Speaker are barred by the speech or Debate Clause Article I, Section 6, Clause 1, g) Claims against Congress and Executive branch of officials and agencies

1. The Court has subject matter jurisdiction

Defendants claim that plaintiff submit disjointed allegations are insubstantial and implausible, and the court should dismiss plaintiff's complain for lack of subject matter jurisdiction on the grounds that the complaint is frivolous and devoid of merit.

As Plaintiff described in the complaint and introduction, plaintiff submitted material to defendants proximally one month earlier before the election and explained the importance / severity of the investigation related to voting. The material shows severe issues related to two presidential candidates, including Accessary to murder (Genocide in China), National Security, Hate crime, etc. It is related to the voting right of every citizen, including the plaintiff. “a statute provides the basis for both the subject matter jurisdiction of the federal court and the plaintiff's substantive claim for relief.” Id. at 926 quoting *Sun Valley Gasoline, Inc. v. Ernst Enters.*, 711 F.2d 138, 139-40 (9th Cir.1983). In the case, it is plaintiff's voting.

Federal Rule of Civil Procedure 8(a) states that a complaint should contain “a short and plain statement of the claim showing that the pleader is entitled to relief,” Fed. R. Civ. P. 8(a)(2), the statement need only ‘give the defendant fair including notice of what the . . . claim is and the grounds upon which it rests.’” *Epos Tech.*, 636 F. Supp.2d 57, 63 (D.D.C. 2009) (quoting *Bell Atlantic v. Twombly*, 550 U.S. 544, 555 (2007)). Plaintiff's complaint complies with the pleading requirements.

2. Plaintiff has Article III standing to sue the federal defendants in this case

Defendants claim that plaintiff lacks Article III standing to sue the federal defendants because the defendants failed to investigate and his personal grievances do not establish a case or controversy. Actually, this is not the plaintiff's personal grievances, it affects every citizen. It is a *national* issue. Most Americans do not even see those materials or know they exist. Without an investigation and account to the public, the plaintiff has no way to vote for those two presidential candidates as I stated. So it definitely harmful to the plaintiff's rights (and Plaintiff believes every citizen's right) of voting since those two are the major presidential candidates.

3. The Court has personal jurisdiction because this is a national issue

Defendants claim that plaintiff's complaint against Senator McConnell and House Speaker Ryan should be dismissed for lack of personal jurisdiction because both Senator McConnell and House Speaker lack the requisite minimum contacts with Ohio, and also same if any of the other federal defendants is sued in their individual capacity.

Plaintiff has stated that this is national issue and affects every US citizen's right to vote, including plaintiff. All defendants are sued here because they are either Senator Leader, House Speaker, President, Vice President or candidate, Secretary of a related Federal Agency, or a party leader, etc.

Plaintiff explained the importance, urgency and severity of the investigation related to voting to Senator Mitch McConnell's staff on Oct 7, 2016 when Plaintiff visited congress in person. Plaintiff also requested Senator Mitch McConnell's staff to ask Senator Mitch McConnell to deliver the message and a package to president Obama, even though plaintiff mailed a hard copy to president Obama at the same time. His staff did listen to plaintiff and accept both packages. Plaintiff also encountered another official in house building when Plaintiff handed this document to her, and the first question she asked is: Did you give to house speaker? Plaintiff said "yes". And she said: "That is good, important".

As plaintiff presented, those issues are of extreme national importance, related to every US citizen's right of voting: Accessory to Murder (Genocide in China), National Security, Trump NJ tower rich Chinese EB5 urgent approved due to Hurricane Sandy, and Hate Crime. The efforts needs both Senator Leader and House speaker's attention to organize and work together with related congress committees, different federal agencies and notification of results to all US citizens, including plaintiff.

4. Plaintiff tried best to perfect services based on court instruction and defendants published contact address

Defendants claimed that plaintiff failed to Perfect service to many of the federal defendants. Plaintiff has followed instructions based on ProSe handbook provided by court using certified mail with return address, used the contact address published in the web for each defendants.

Supplemental Release

Based on court records, service has been perfected for defendants Mike Pence, FBI, James Comey, SEC, Justice Department and State Department. Court also have all records for mailed certified mails for this case.

Here are the USPS record that defendants claimed service not perfected:

Former President Barack Obama, USPS track number 7016 1370 0000 5510 4732, delivered on 12/28/2016

Former vice president Joe Biden, USPS track number 7016 1370 0000 5510 4862, delivered on 12/28/2016

Former Secretary of State John Kerry, USPS track number 7016 1370 0000 5510 4824 delivered on 12/28/2016

Former Secretary of Homeland Security Jeh Johnson, USPS track number 7016 1370 0000 5510 4831 delivered on 12/27/2016

The department of Homeland Security USPS track number 7016 1370 0000 5510 4817 delivered on 12/27/2016

The central Intelligence Agency USPS track number 7016 1370 0000 5510 4794 delivered on 12/28/2016

John Brennan, director of CIA, USPS track number 7016 1370 0000 5510 4800 delivered on 12/28/2016

House Speaker Paul Ryan , USPS track number 7016 1370 0000 5510 4886 delivered on 12/27/2016

Senator leader Mitch McConnell , USPS track number 7016 1370 0000 5510 487 delivered on 12/27/2016

All defendants were all represented by John J Stark, based on court record.

5. Plaintiff did not sue Senator and Speaker due to their speech or Debate clause

Defendants claimed that Senator and Speaker are barred by the speech or Debate Clause Article I, Section 6, Clause 1,

Plaintiff did not sue Senator and Speaker due to their speech or Debate clause, it is actually due to the severity of the issue were not even be addressed, regardless of any speech or debate.

6. Voting, National Security and Accessary to Murder is common sense of importance for everyone

Defendants stated that plaintiff claims against Congress and Executive branch of officials and agencies, should be easily fail on the merits, because no court has ever recognized a cause or action against a member of congress for taking or failing to take legislative action to a citizen's satisfaction, and same is true for executive branch officials and agencies, since plaintiff is not entitled to any judicial directive that requires a federal agency to investigate the matters he personally feels are important.

All materials plaintiff submitted and stated in the introduction, as everyone could see, even 106 U.S. Congressmen who made a similar request by signing a "Dear Colleague Letter" to Secretary of State Hillary Clinton in 2012 to request the State Department release any information related to organ harvesting in China. For a Chinese top level spy, Chinese web information for sure is the first hand of source for research and investigation. It is also obvious that Trump hid the scandalous fact from the media that Trump NJ tower Rich Chinese EB5 was urgently approved due to Hurricane Sandy.

And it is not just to the plaintiff's own satisfaction. As I stated, those issues are related to every US citizen's right to vote, the plaintiff is just one of the victims.

And if this Court makes a ruling on the merits, as a matter of law, there will be a decision one way or the other on the merits and no need for a dismissal of Plaintiffs' Complaint.

If this Court finds that further facts would be necessary to its decision, then those will be provided under a prior order of this Court.

Conclusion

For the foregoing reasons, plaintiff respectfully requests that the Court deny Defendants' Motion to Dismiss the Complaint.

Respectfully Submitted

Hong Wang



(b)(6)

CERTIFICATE OF SERVICE

I certify that on February 14, 2017, I filed the PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS to UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION, and that on the same date I served this opposition to defendant's motion to dismiss to John J Stark, assistant United States Attorney, 303 Marconi Boulevard, Suite 200 Columbus OH 43215 by Fedex Express.

Hong Wang



(b)(6)